

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

)	
In re)	Chapter 11
)	
REVLON, INC., <i>et al.</i> , ¹)	Case No. 22-10760 (DSJ)
)	
Debtors.)	Jointly Administered
)	

NOTICE OF APPEAL

Through undersigned counsel, Napoli Shkolnik PLLC (“NS”), personal injury creditors Jamey Capers, Bonita Newman, Derenna Moon, and Tamera Keys appeal from **(a)** the *Order (I) Establishing Supplemental Deadline for Submitting Hair Straightening Proofs of Claim, (II), Approving the Notice Thereof, and (III) Granting Related Relief*, dated Mar. 7, 2023 (ECF No. 1574, attached as Exhibit A); and **(b)** the *Order Denying the Motion for Reconsideration*, dated Apr. 19, 2023 (ECF No. 1817, attached as Exhibit B).

The names of the other parties to the orders appealed from and the names, addresses, and telephone numbers of their respective attorneys are:

¹ The last four digits of Debtor Revlon, Inc.’s tax identification number are 2955. Due to the large number of Debtors in these Chapter 11 Cases, for which the Court has granted joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/Revlon>. The location of the Debtors’ service address for purposes of these Chapter 11 Cases is: 44 Water Street, 43rd Floor, New York, NY 10041-0004.

<u>PARTY</u>	<u>REPRESENTED BY:</u>
<p><u>Appellees</u></p> <p><u>Appellees - Debtors</u> Revlon, Inc. Elizabeth Arden USC, LLC BrandCo Almay 2020 LLC Elizabeth Arden, Inc. BrandCo Charlie 2020 LLC FD Management, Inc. Revlon Consumer Products Corporation BrandCo CND 2020 LLC North America Revsale Inc. OPP Products, Inc. Almay, Inc. BrandCo Curve 2020 LLC RDEN Management, Inc. BrandCo Elizabeth Arden 2020 LLC Art & Science, Ltd. Realistic Roux Professional Products Inc. Roux Laboratories, Inc. BrandCo Giorgio Beverly Hills 2020 LLC Revlon Development Corp. Roux Properties Jacksonville, LLC BrandCo Halston 2020 LLC Revlon Government Sales, Inc. SinfulColors Inc. BrandCo Jean Nate 2020 LLC RML, LLC Revlon International Corporation Bari Cosmetics, Ltd. PPI Two Corporation Revlon Professional Holding Company LLC BrandCo Mitchum 2020 LLC Revlon (Puerto Rico) Inc. Riros Corporation BrandCo Multicultural Group 2020 LLC Elizabeth Arden (UK) Ltd. Riros Group Inc. Beautyge Brands USA, Inc. Elizabeth Arden (Canada) Limited BrandCo PS 2020 LLC</p>	<p>Paul M. Basta, Esq. Alice Belisle Eaton, Esq. Kyle J. Kimpler, Esq. Robert A. Britton, Esq. Brian Bolin, Esq. Sean A. Mitchell, Esq. Paul Weiss Rifkind Wharton & Garrison LLP 1285 Avenue of the Americas New York, NY 10019 Tel.: (212) 373-3000 Fax: (212) 757-3990</p>

<p>BrandCo White Shoulders 2020 LLC Revlon Canada Inc. Beautyge USA, Inc. Beautyge I Charles Revson Inc. Beautyge II, LLC Creative Nail Design, Inc. Cutex, Inc. DF Enterprises, Inc. Elizabeth Arden (Financing), Inc. Elizabeth Arden Investments, LLC Elizabeth Arden NM, LLC Elizabeth Arden Travel Retail, Inc.</p>	
<p><u>Appellees – Members of the Official Committee of Unsecured Creditors</u> Pension Benefit Guaranty Corporation Orlandi, Inc. Stanley B. Dessen; Eric Biljetina, as independent executor of the estate of Jolynne Biljetina David Poulton</p> <p>U.S. Bank Trust Company, National Association as successor to U.S. Bank National Association</p>	<p>James S. Carr, Esq. Philip A. Weintraub, Esq. Kelley Drye & Warren LLP 3 World Trade Center 175 Greenwich Street New York, NY 10007 Tel: 212-808-7800 Fax: 212-808-7897</p> <p>Clark T. Whitmore, Esq. Jason M. Reed, Esq. Maslon LLP 90 South Seventh Street, Suite 3300 Minneapolis, MN 55402 Tel: (612) 672-8200 Fax: (612) 642-8301</p>

<p><u>Appellees – BrandCo Lenders</u> BrandCo Agent BrandCo Lender Group Advisors</p>	<p>Eli J. Vonnegut, Esq. Angela M. Libby, Esq. Stephanie Massman, Esq. Davis Polk & Wardwell LLP 450 Lexington Avenue New York, New York 10017 Tel: (212) 450-4331 Fax: (212) 701-5331</p>
<p><u>Appellees – 2016 Term Loan Lenders</u> 2016 Term Loan Agent 2016 Term Loan Lender Group Advisors Akin Gump Strauss Hauer & Feld LLP Ad Hoc Group of 2016 Term Loan Lenders</p>	<p>James Savin, Esq. Kevin Zuzolo, Esq. Akin Gump Strauss Hauer & Feld LLP 2001 K Street, N.W. Washington, D.C. 20006 Tel: (202) 887-4000 Fax: (202) 887-4288</p>
<p><u>Appellees – Hair Straightening Advisor</u> Hair Straightening Advisor</p>	

Dated: New York, New York
May 2, 2023

Respectfully submitted,

/s/ Hunter Shkolnik

Hunter Shkolnik
NSPR LAW SERVICES LLC
1302 Avenida Ponce de Leon
Santurce, PR 00907
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Hunter@nsprlaw.com

CERTIFICATE OF SERVICE

I certify that on May 2, 2023, I electronically filed this document with the Clerk of the Court using CM/ECF.

I also certify that this document is being served today on all counsel of record by transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Hunter Shkolnik

Hunter Shkolnik

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EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

REVLON, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-10760 (DSJ)

(Jointly Administered)

**ORDER (I) ESTABLISHING
SUPPLEMENTAL DEADLINE FOR SUBMITTING
HAIR STRAIGHTENING PROOFS OF CLAIM, (II) APPROVING
THE NOTICE THEREOF, AND (III) GRANTING RELATED RELIEF**

Upon the *Debtors’ (I) Omnibus Reply to the Motions to Extend the Bar Date and (II) Submission of a Proposed Order (A) Establishing Supplemental Deadline for Submitting Hair Straightening Proofs of Claim, (B) Approving the Notice Thereof, and (C) Granting Related Relief* (the “Reply”)² of the above-captioned debtors and debtors in possession (collectively, the “Debtors”) and the Motions; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Application in this district is

The last four digits of Debtor Revlon, Inc.'s tax identification number are 2955. Due to the large number of debtor entities in these Chapter 11 Cases, for which the Court has granted joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/Revlon>. The location of the Debtors' service address for purposes of these Chapter 11 Cases is: 55 Water St., 43rd Floor, New York, NY 10041-0004.

Capitalized terms not otherwise herein defined shall have the meanings ascribed to such terms in Reply, the *Order (I) Establishing Deadlines for (A) Submitting Proofs of Claim and (B) Requests for Payment under Bankruptcy Code Section 503(B)(9), (II) Approving the Form, Manner and Notice Thereof, and (III) Granting Related Relief* [Docket No. 688] (the “Bar Date Order”), or the *Order Approving (I) the Adequacy of the Disclosure Statement, (II) Solicitation and Voting Procedures with Respect to Confirmation of the Plan, (III) the Form of Ballots and Notices in Connection Therewith, and (IV) the Scheduling of Certain Dates with Respect Thereto* [Docket No. 1516] (the “Disclosure Statement Order”), as applicable.

proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having reviewed the Motions and the Reply and having heard the statements in support of the relief requested therein at a hearing held on March 7, 2023 before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Reply and at the Hearing establish just cause for the relief granted herein; and this Court having found that notice of the relief granted by this order was appropriate under the circumstances and no other notice need be provided; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Court hereby approves the Hair Straightening Proof of Claim Form substantially in the form attached to this order as **Exhibit 1** and the Hair Straightening Publication Notice substantially in the form attached to this order as **Exhibit 2**.

2. The manner of providing notice of the Hair Straightening Bar Date as set forth herein is approved in all respects pursuant to Bankruptcy Rules 2002(a)(7) and 2002(l).

3. Any Person or Entity (including, without limitation, any individual, partnership, joint venture, corporation, estate, and trust) that holds, or seeks to assert, a prepetition Claim (as defined in section 101(5) of the Bankruptcy Code) against the Debtors alleging prepetition claims arising out of or related to the alleged use of or exposure to chemical hair straightening or relaxing products produced, manufactured, or sold by Revlon, Inc. or its affiliated Debtors, including without limitation those hair straightening or relaxing products marketed under the brands “Crème of Nature”, “African Pride,” “French Perm,” “Fabulaxer,” “Revlon Professional,” “Revlon Realistic,” “Herbarich,” or “All Ways Natural Relaxer” that arose, or is deemed to have arisen, prior to June 15, 2022 (the “Petition Date”), no matter how remote, contingent, unliquidated, manifested or unmanifested (such claimants, the “Hair Straightening Claimants,” and such claims,

the “Hair Straightening Claims”), must properly file a Proof of Claim on the Hair Straightening Proof of Claim Form (such Proofs of Claims, the “Hair Straightening Proofs of Claim”) on or before **April 11, 2023 at 5:00 p.m., prevailing Eastern Time** (the “Hair Straightening Bar Date”) (pursuant to the procedures set forth in this Order and the Bar Date Order) in order to share in any distributions by the Debtors’ estates. Any Hair Straightening Proof of Claim filed prior to the Hair Straightening Bar Date shall be deemed timely filed as an unsecured, unliquidated, disputed claim (subject to allowance or disallowance of such claim by a court of competent jurisdiction).

4. The Hair Straightening Proof of Claim Form must be completed by any Hair Straightening Claimant seeking to file a Proof of Claim on account of a Hair Straightening Claim.

5. Paragraph 11 of the Bar Date Order shall not apply to Hair Straightening Proofs of Claims. A Hair Straightening Proof of Claim must satisfy all of the following requirements to be considered properly and timely filed in these Chapter 11 Cases:

- a. be actually received by Kroll as described in the preceding paragraph above by overnight mail, courier service, hand delivery, regular mail, in person or electronically through the Hair Straightening Proof of Claim filing system available on Kroll’s website on or before the Hair Straightening Bar Date;
- b. be signed by the Hair Straightening Claimant or by an authorized agent of the Hair Straightening Claimant, which may be satisfied by electronic signature through the electronic claims filing system described above;
- c. be written in the English language;
- d. conform substantially to the Hair Straightening Proofs of Claim Form;
- e. set forth with specificity the legal and factual basis for the alleged Hair Straightening Claim including substantially all of the information requested in the Hair Straightening Proof of Claim Form;
- f. be denominated in lawful currency of the United States; and
- g. include supporting documentation or an explanation as to why such documentation is not available.

6. Except as specifically set forth in this order, the Hair Straightening Claimants, the Hair Straightening Claims, and the Hair Straightening Proofs of Claim are subject to, and must comply with, all requirements set forth in the Bar Date Order that are applicable to Claimants, Claims, and Proofs of Claim that are subject to the General Bar Date, including, but not limited to, the requirement that each separate Hair Straightening Claimant file a separate Proof of Claim.

7. Hair Straightening Claimants that file a Hair Straightening Proof of Claim through Kroll's online portal on or prior to **March 23, 2023 at 4:00 p.m., prevailing Eastern Time** may submit a vote to accept or reject the Plan on account of such Hair Straightening Claim online at the time they submit their Hair Straightening Proof of Claim (such Hair Straightening Claims, the "Voting Hair Straightening Claims"). Such Hair Straightening Claimants shall not be required to complete Parts 3, 4, 5, or 6 of the Hair Straightening Proof of Claim Form in order to submit a timely claim sufficient for purposes of casting a vote on the Plan; *provided* that each Hair Straightening Claimant that submits an incomplete Proof of Claim on or prior to March 23, 2023 at 4:00 p.m. prevailing Eastern Time must amend or supplement its Proof of Claim to provide complete responses to each Part of the Proof of Claim form to the best of such claimants' ability on or prior to the Hair Straightening Bar Date. Any such amended or supplemental proof of claim shall be clearly marked as an amendment or supplement to a prior Proof of Claim, and specifically identify such prior Proof of Claim. For the avoidance of doubt, only Hair Straightening Claimants that submit a Hair Straightening Proof of Claim online shall be entitled to vote to accept or reject the Plan, and all Hair Straightening Claimants that submit a Hair Straightening Proof of Claim by mail, hand delivery, or courier shall not be entitled to submit a vote to accept or reject the Plan. Any Hair Straightening Claim that is filed after March 23, 2023 at 4:00 p.m., prevailing Eastern Time shall not be entitled to vote on the Plan.

8. The online portal for submission of Hair Straightening Proofs of Claims in accordance with the Hair Straightening Proof of Claim Form shall be made available on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/Revlon> by **March 10, 2023**, or as soon as reasonably practicable thereafter.

9. Except as specifically set forth in this order, votes to accept or reject the Plan on account of Voting Hair Straightening Claims are subject to, and must comply with, all requirements set forth in the Disclosure Statement Order. For the avoidance of doubt, Ballots cast on account of Voting Hair Straightening Claims shall be tabulated in Class 9(d) and treated as disputed Claims in wholly unliquidated or unknown amounts for voting purposes, and Ballots cast by Holders of Voting Hair Straightening Claims shall count for satisfying the numerosity requirement of section 1126(c) of the Bankruptcy Code and shall count as Ballots for Claims in the amount of \$1.00 solely for the purposes of satisfying the dollar amount provisions of section 1126(c) of the Bankruptcy Code.

10. Kroll shall not be required to include Ballots cast on account of Voting Hair Straightening Claims in the initial Voting Report filed by the deadline set forth in the Disclosure Statement Order. Kroll shall file a supplemental Voting Report at least seven (7) days prior to the Confirmation Hearing that includes all Ballots cast on account of Voting Hair Straightening Claims, to the extent received by Kroll on or before **March 20, 2023 at 4:00 p.m., prevailing Eastern Time**, in the tabulation of Ballots. Kroll shall make a good faith effort, but shall not be required, to process Hair Straightening Proofs of Claim and Ballots cast thereon that are received after March 20, 2023 at 4:00 p.m., prevailing Eastern Time and to supplement the Voting Report at any time prior to the Confirmation Hearing notwithstanding the deadlines set forth in Local Rule 3018-1.

11. Hair Straightening Proofs of Claim that are properly filed online by March 20, 2023 at 4:00 p.m., prevailing Eastern Time are deemed allowed for voting purposes only against Revlon, Inc. However, Kroll is authorized to treat Ballots cast on account of Voting Hair Straightening Claims as duplicate votes for purposes of tabulation if the Hair Straightening Proofs of Claim that such Voting Hair Straightening Claims are submitted on are filed by Hair Straightening Claimants with identical names and addresses.

12. In the event that multiple Ballots are cast by a Hair Straightening Claimant with identical names and addresses, the last properly executed, timely received, and otherwise validly executed and submitted Ballot will be deemed to reflect that voter's intent and will supersede and revoke any prior Ballot.

13. To the extent that any issues arise with respect to the tabulation of the Ballots cast on account of Voting Hair Straightening Claims and such issues are not addressed by the existing Solicitation and Voting Procedures, the Disclosure Statement Order, or this order, such issues shall be described in the supplemental Voting Report.

14. **Any entity or person who fails to file a Hair Straightening Proof of Claim online in accordance with paragraph 7 of this order on or before March 23, 2023 at 4:00 p.m., prevailing Eastern Time shall be prohibited from voting to accept or reject the Plan with respect to such Hair Straightening Claim.**

15. **Any entity or person who is required, but fails, to file a Hair Straightening Proof of Claim in accordance with this order on or before April 11, 2023 at 5:00 p.m., prevailing Eastern Time shall be prohibited from participating in any distribution in these chapter 11 cases on account of such Hair Straightening Claim, or receiving further notices regarding such Hair Straightening Claim.**

16. By not later than March 17, 2023, Kroll shall publish notice of the Hair Straightening Bar Date, in substantially the form of the Hair Straightening Publication Notice, in the national editions of the *New York Times* and *USA Today*, and the national edition of *The Globe and Mail* in Canada. Kroll shall file proof of such publication as soon as reasonably practicable. The Debtors shall provide internet notice of the Hair Straightening Bar Date through the worldwide web and social media outlets substantially in accordance with representations made on the record at the Hearing.

17. The manner of notice of the Hair Straightening Bar Date by publication of the Hair Straightening Publication Notice as set forth herein is hereby approved and shall be deemed good, adequate, and sufficient notice for all relevant purposes, including to all Hair Straightening Claimants of their rights and obligations in connection with prepetition claims they may assert against the Debtors or their estates in these chapter 11 cases.

18. Any submitted Hair Straightening Proof of Claim shall be made publicly available on the Debtors' case information website (located at <https://cases.ra.kroll.com/Revlon>) (the "Case Website"); *provided* that any supporting documentation attached thereto, including any medical records, shall not be made publicly available on the claims register or Case Website.

19. Nothing in this order shall be construed as limiting or prohibiting the Debtors or Kroll from providing notice of this order, the Hair Straightening Bar Date, the Hair Straightening Publication Notice, or any other notice regarding the Bar Dates applicable to Hair Straightening Claims in any manner not particularly described in this order. The Debtors and Kroll are authorized to provide such further or additional notice of this order, the Hair Straightening Bar Date, the Hair Straightening Publication Notice, or any other notice regarding the Bar Dates applicable to Hair Straightening Claims as they deem necessary or appropriate.

20. Nothing contained in this order, and no action taken pursuant to the relief granted herein, is intended as or should be construed or deemed to be: (a) an admission as to the amount of, basis for, or validity of any claim against a Debtor, under the Bankruptcy Code or other applicable nonbankruptcy law; (b) a waiver of the Debtors' or any other party in interest's right to dispute or object to any claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication, admission or finding that any particular claim is an administrative expense claim, priority claim, or secured claim; (e) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; (f) an admission as to the validity, priority, enforceability or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; (g) a waiver or limitation of any claims, causes of action or other rights of the Debtors or any other party in interest against any person or entity under the Bankruptcy Code or any other applicable law; (h) a waiver of the Debtors' right to amend or supplement the Schedules, including by subsequently designating any scheduled Claim as disputed, contingent, or unliquidated; or (i) a waiver of any other right of the Debtors.

21. Pursuant to Bankruptcy Rule 3003(c)(2), any Hair Straightening Claimant that is required to file a Hair Straightening Proof of Claim in these Chapter 11 Cases pursuant to the Bankruptcy Code, the Bankruptcy Rules, or this order with respect to a particular prepetition Hair Straightening Claim, but that fails to do so properly by the Hair Straightening Bar Date, shall be forever barred, estopped, and enjoined from: (a) asserting such Hair Straightening Claim against the Debtors and their chapter 11 estates (or filing a Proof of Claim with respect thereto), and the Debtors and their properties and estates shall be forever discharged from any and all indebtedness or liability with respect to such Hair Straightening Claim and (b) voting upon, or receiving

distributions under, any chapter 11 plan in these Chapter 11 Cases or otherwise in respect of or on account of such Hair Straightening Claim, and such Person or Entity shall not be treated as a creditor with respect to such Hair Straightening Claim for any purpose in these Chapter 11 Cases.

22. All objections, responses, statements, or comments, if any, in opposition to the relief set forth herein that have not otherwise been resolved or withdrawn prior to, or on the record at, the Hearing are overruled in their entirety.

23. The provisions of this order apply to all Hair Straightening Claims of whatever character or nature against the Debtors, their estates or their assets, whether secured or unsecured, priority or non-priority, liquidated or unliquidated, or fixed or contingent.

24. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

25. The Debtors and Kroll are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Application.

26. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: New York, New York
March 7, 2023

s/ David S. Jones

HONORABLE DAVID S. JONES
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT 1

HAIR STRAIGHTENING PROOF OF CLAIM FORM

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

REVLON, INC., *et al.*,

Debtors.

Chapter 11

Case No. 21-10760 (DSJ)

(Jointly Administered)

Hair Straightener Claimant Proof of Claim Form

You may file your claim electronically at <https://cases.ra.kroll.com/Revlon/> via the link entitled "Submit a Claim."

For questions regarding this Proof of Claim Form, please call Kroll at (855) 631-5341 or visit <https://cases.ra.kroll.com/Revlon/>.

Read the instructions at the end of this document before filling out this form. This form is for individuals or entities to assert a pre-petition unsecured claim against the Debtors related to the claimant's pre-petition use of or exposure to, or another person's (for example, deceased, incapacitated, or minor family member) pre-petition use of or exposure to, Hair Straightener Products produced, manufactured, or sold by Revlon, Inc. or its affiliated Debtors.

Do not use this form to assert any other pre-petition claims.

Creditor (also referred to as "You" throughout) shall provide information responsive to the questions set forth below. Instructions and definitions are provided at the end of this document. You shall provide information reasonably available to You and are not excused from providing the requested information for failure to appropriately investigate Your claim. You shall supplement Your responses if You learn that they are incomplete or incorrect in any material respect.

Fill in all the information about the claim as of June 15, 2022, the Petition Date. If You do not provide sufficient information responsive to the questions set forth below, You may be asked or required to provide additional information at a later date. You may also amend or supplement Your claim after it is filed, subject to applicable bankruptcy law and rules. Failure to provide the required information may result in denial of Your claim.

Please note that supporting documentation is requested in certain portions of the form. Please provide the requested information to the best of Your ability. You may also provide additional information to supplement Your claim in any manner available to You. Supporting documentation submitted with the form will not be made publicly available on the claims register or the Debtors' case website.

Do not send original documents, as they will not be returned, and they may be destroyed after scanning.

Part 1: Identify the Claim

1. Who is the creditor?

Name of the individual or entity to be paid for this claim. If the creditor is a minor (under 18), please provide only the minor's initials and the full name of the minor's parent or guardian.

Other names the creditor used with the debtor, including maiden or other names used:

If Your claim is based on another person's use of or exposure to Hair Straightener Products (for example, a deceased, incapacitated, or minor family member), please provide the name of that other person (that is, the injured person). If the injured person is a minor (under 18), please provide only the minor's initials and the full name of the minor's parent or guardian:

If You are submitting a claim on behalf of another person, please provide Your name and relationship to that person:

If you are submitting a claim on behalf of a minor, are You the Legal Guardian?

☐ No

☐ Yes

2. What is the year of birth, gender, and last 4 digits of the social security number of the creditor (or injured person, if the claim is based on another's use of or exposure to Hair Straightener Products)?

Year of Birth: _____ Gender: ☐ Male ☐ Female

Last 4 Digits of Social Security Number (if available): XXX-XX-____ _

3. Where should notices and payments to the creditor be sent?

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?			Where should payments to the creditor be sent? (if different)		
Name _____			Name _____		
Number _____	Street _____		Number _____	Street _____	
City _____	State _____	ZIP Code _____	City _____	State _____	ZIP Code _____
Contact phone _____			Contact phone _____		
Contact email _____			Contact email _____		

4. Does this claim amend one already filed? ☐ No. ☐ Yes. Claim number on court claims registry (if known) _____ Filed on MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim? ☐ No. ☐ Yes. Who made the earlier filing? _____

Part 2: Attorney Information (Optional)

6. Are You represented by an attorney in this matter? ☐ No. ☐ Yes. If yes, please provide the following information:

You do not need an attorney to file this form.

Law Firm Name _____

Attorney Name _____

Address _____

City _____ State _____ ZIP Code _____

Contact phone _____ Contact email _____

Part 3: Information as of June 15, 2022, the Petition Date, About Your Claim

7. How much is the claim? \$ _____ or ☐ Unknown.

8. Select all that apply to You.

☐ Creditor has a claim related to the use of or exposure to a Hair Straightener Product.

☐ Although Creditor is not currently aware of any claim, Creditor wants to file now to keep the ability to seek payment if Creditor has a future claim due to use of or exposure to a Hair Straightener Product.

☐ Creditor has a claim arising out of another person's use of or exposure to a Hair Straightener Product (including loss of consortium and/or emotional distress due to death or injury of another). **Please answer all questions in Part 4 as if that person (the injured person) is filling out the form.**

9. Describe the type of injury alleged from Your use of or exposure to or another person's use of or exposure to a Hair Straightener Product. Select all that apply. Attach additional sheets if necessary.	<div><input type="checkbox"/> Death</div> <div><input type="checkbox"/> Lost Wages/Earning Capacity</div> <div><input type="checkbox"/> Loss of Consortium</div> <div><input type="checkbox"/> Illness</div> <div><input type="checkbox"/> Expenses for Treatment</div> <div><input type="checkbox"/> Emotional Distress</div> <div><input type="checkbox"/> Other (describe): _____</div> <div>_____</div> <div>_____</div> <div>_____</div>
10. Describe the basis for Your claim, including all alleged causes of action, sources of damages, etc., You are asserting against the Debtors. Attach additional sheets if necessary.	<div>_____</div> <div>_____</div> <div>_____</div> <div>_____</div> <div>_____</div> <div>_____</div> <div>_____</div> <div>_____</div> <div>_____</div> <div>_____</div>
11. Please identify and quantify each category of damages or monetary relief that You allege, including all injunctive relief that You seek. Check as many boxes as are applicable.	<div><input type="checkbox"/> Compensatory: \$ _____ or <input type="checkbox"/> Unknown (for example, lost wages, pain and suffering, expenses not reimbursed, loss of consortium, etc.)</div> <div><input type="checkbox"/> Punitive: \$ _____ or <input type="checkbox"/> Unknown</div> <div><input type="checkbox"/> Other (describe): _____</div>

Part 4: Information About Use of or Exposure to Hair Straightener Products

If You have a claim arising out of another person's use of or exposure to a Hair Straightener Product, please answer these questions as if the injured person is filling out the form.

13. Describe the hair straightener products that You currently use or are exposed to or previously used or were exposed to, including both products manufactured by the Debtors and other manufacturers.

14. For each hair straightener product identified in question, 13, during which years did You use or were You exposed to such products?

Part 5: Other Hair Straightener Products-Related Claims

15. Do You believe You have any other pre-petition claims against the Debtors based on or involving the Debtors' production, marketing and sale of Hair Straightener Products that are not described above?

☐ No.

☐ Yes. If yes, please describe the nature of the claim(s) (Attach additional sheets if necessary).

16. How much is the claim? \$ _____ or ☐ Unknown.

Part 6: Supporting Documentation

17. Please provide the following supporting documentation to supplement this proof of claim, to the best of Your ability.

Supporting documents, including medical records, will not be publicly filed.

☒ Provide any documents supporting Your claim.

Part 7: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

- ☐ I am the creditor.
☐ I am the creditor's attorney, guardian, kinship (or other authorized) caretaker, executor, or authorized agent.
☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.
☐ Other (describe): _____

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____ (mm/dd/yyyy)

Signature

Print the name of the person who is completing and signing this claim:

Name
First name Middle name Last name

Title

Company

Address
Number Street

City State ZIP Code

Contact phone Email

Instructions for Hair Straightener Claimant Proof of Claim Form

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

How to fill out this form

- **Fill in all of the information about the claim as of the date the case was filed.** You are required to provide information responsive to each question set forth on this form.
- **If the claim has been acquired from someone else, then state the identity of the last party** who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- **Attach any supporting documents to this form.** Attach redacted copies of any documents that support the claim alleged. (See the definition of *redaction* on the next page.) Supporting documentation submitted with this form will not be made publicly available on the claims register or the Debtors' case website.
- **Do not attach original documents because attachments may be destroyed after scanning.**
- **A Proof of Claim form and any attached documents must show only the last 4 digits of any social security number, individual's tax identification number, or financial account number, and only the year of any person's date of birth.** See Bankruptcy Rule 9037.
- **For a minor child, fill in only the child's initials and the full name and address of the child's parent or guardian.** For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.
- If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent's website at <https://cases.ra.kroll.com/Revlon>.

Understand the terms used in this form

Claim: A creditor's right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy. 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. § 101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. § 101 (13).

Hair Straightener Product: Chemical hair straightening or relaxing products produced, manufactured, or sold by Revlon or its affiliated Debtors, including without limitation those hair straightening or relaxing products marketed under the brands "Crème of Nature," "African Pride," "French Perm," "Fabulaxer," "Revlon Professional," "Revlon Realistic," "Herbarich," or "All Ways Natural Relaxer"

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Pre-petition claim: A claim, as that term is defined in section 101 of the Bankruptcy Code, arising on or prior to June 15, 2022, including any fixed or contingent claim that may be asserted now or in the future on account of use or exposure to a Hair Straightener Product prior to June 15, 2022, regardless of whether any injury actually manifested prior to such date.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to privacy on the Proof of Claim form and any attached documents.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

If by first class mail:

Revlon, Inc. - Claims Processing
Center c/o Kroll Restructuring
Administration Grand Central
Station, PO Box 4850 New York,
NY 10163-4850

If by hand delivery, or overnight

courier: Revlon, Inc. - Claims
Processing Center c/o Kroll
Restructuring Administration 850
3rd Avenue, Suite 412
Brooklyn, NY 11232

You may also file your claim electronically at

<https://cases.ra.kroll.com/Revlon/EPOC-Index>.

Do not file these instructions with your form
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EXHIBIT 2

HAIR STRAIGHTENING PUBLICATION NOTICE

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
)	
REVLON, INC., <i>et al.</i> , ¹)	Case No. 22-10760 (DSJ)
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF DEADLINE
FOR FILING OF HAIR STRAIGHTENING PROOFS OF CLAIM**

On June 15, 2022 (the “Petition Date”), Revlon, Inc. and its affiliated debtors and debtors-in-possession (each a “Debtor” and, collectively, the “Debtors” or “Revlon”) filed voluntary petitions for relief under chapter 11 of title 11 of the U.S. Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of New York (the “Court”). The last four digits of Revlon, Inc.’s tax identification number are 2955. Due to the large number of Debtors in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein.

The Debtors currently produce, manufacture, and sell, and/or have in the past produced, manufactured, and sold, chemical hair straightening or relaxing products. These products may include, among others, brands such as “Crème of Nature,” “African Pride,” “French Perm,” “Fabulaxer,” “Revlon Realistic,” “Revlon Professional,” “HerbaRich,” and “All Ways Natural Relaxer.” Since October 2022, numerous cases have been filed in courts across the country on behalf of plaintiffs alleging personal injury and/or wrongful death claims relating to certain chemical hair straightening or relaxing products. The Debtors believe that alleged claims concerning chemical hair straightening or relaxing products they currently sell or have sold in the past are meritless.

The Court has set a supplemental deadline for submitting prepetition claims against the Debtors relating to or arising out of the alleged use of or exposure to any of the Debtors’ chemical hair straightening or relaxing products. To preserve any prepetition claim you may have against a Debtor related to use of or exposure to any chemical hair straightening or relaxing products that were produced, manufactured, or sold by the Debtors, you **MUST** file a proof of claim form with the Court, *or you will forever lose your rights to recover on your claim in the future.*

¹ The last four digits of Debtor Revlon, Inc.’s tax identification number are 2955. Due to the large number of debtor entities in these Chapter 11 Cases, for which the Court has granted joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/Revlon>. The location of the Debtors’ service address for purposes of these Chapter 11 Cases is: 55 Water St., 43rd Floor, New York, NY 10041-0004.

WHILE THE DEBTORS BELIEVE THAT SUCH CLAIMS ARE MERITLESS, IF YOU, YOUR SPOUSE, OR AN IMMEDIATE FAMILY MEMBER HAS EVER USED OR BEEN EXPOSED TO CHEMICAL HAIR STRAIGHTENING OR RELAXING PRODUCTS PRODUCED, MANUFACTURED, OR SOLD BY REVLON, INCLUDING THOSE MARKETING UNDER ITS BRANDS, INCLUDING WITHOUT LIMITATION CHEMICAL HAIR STRAIGHTENING OR RELAXING PRODUCTS UNDER THE “CRÈME OF NATURE”, “AFRICAN PRIDE,” “FRENCH PERM,” “FABULAXER,” “REVLON PROFESSIONAL,” “REVLON REALISTIC,” “HERBARICH,” OR “ALL WAYS NATURAL RELAXER” BRANDS, AND THAT USE OR EXPOSURE CAUSED INJURY THAT BECAME APPARENT IN THE PAST OR THAT MAY BECOME APPARENT IN THE FUTURE, YOU MAY HAVE A CLAIM UNDER VARIOUS LEGAL THEORIES FOR DAMAGES IN REVLON’S CHAPTER 11 CASES. AMONG OTHER THINGS, PERSONAL INJURY DAMAGES COULD RELATE TO PHYSICAL, EMOTIONAL, OR OTHER PERSONAL INJURIES, SUCH AS PERSONAL OR BODILY INJURY, WRONGFUL DEATH, LOSS OF CONSORTIUM, MEDICAL MONITORING, SURVIVORSHIP, OR PROXIMATE, CONSEQUENTIAL, GENERAL, AND SPECIAL DAMAGES OR PUNITIVE DAMAGES. IT IS POSSIBLE THAT YOUR INJURY IS NOT YET APPARENT BUT IS STILL SUBJECT TO TREATMENT IN THE DEBTORS’ BANKRUPTCY. PLEASE READ THIS NOTICE CAREFULLY AS FAILURE TO FILE A PROOF OF CLAIM MAY IMPAIR YOUR RIGHTS.

To preserve your potential prepetition claim against the Debtors relating to use of or exposure to any of the Debtors’ chemical hair straightening or relaxing products, you **MUST FILE A PROOF OF CLAIM** on or before **5:00 p.m., prevailing Eastern Time, on April 11, 2023**. If you do not file a proof of claim form, you will forever lose your right to recover on any such prepetition claim in the future. Filing a proof of claim form does not automatically entitle you to compensation. Instructions on how to file a proof of claim online are contained in this notice or may be found by visiting the Debtors’ restructuring website at **<https://cases.ra.kroll.com/revlon/Home-Index>** and clicking on the “Submit a Hair Straightening Claim” link. The online portal for submitting a proof of claim online will be made available on March 10, 2023, or as soon as reasonably practicable thereafter. If you wish to submit a proof of claim prior to the launch of the online portal, you may submit a proof of claim using the Hair Straightening Proof of Claim Form available at **<https://cases.ra.kroll.com/revlon/Home-Index>** by overnight mail, courier service, hand delivery, regular mail, but you will not be entitled to cast a vote on the Debtors’ proposed Plan on account of such claim.

On [____], 2023, the United States Bankruptcy Court for the Southern District of New York (the “Court”) entered an order [Docket No. ____] (the “Hair Straightening Bar Date Order”) establishing a supplemental deadline for filing of proofs of claim alleging prepetition claims arising out of or related to the alleged use of or exposure to the Debtors’ chemical hair straightening or relaxing products, no matter how remote, contingent, unliquidated, manifested or unmanifested, in the chapter 11 cases. Pursuant to the Hair Straightening Bar Date Order, each person or entity (including, without limitation, each individual, partnership, joint venture, corporation, estate, or trust) that holds or seeks to assert a prepetition claim (as defined in section 101(5) of the Bankruptcy Code) alleging prepetition claims arising out of or related to the alleged use of or exposure to chemical hair straightening or relaxing products produced, manufactured, or sold by

Revlon, Inc. or its affiliated Debtors, including without limitation those hair straightening or relaxing products marketed under the brands “Crème of Nature”, “African Pride,” “French Perm,” “Fabulaxer,” “Revlon Professional,” “Revlon Realistic,” “Herbarich,” or “All Ways Natural Relaxer” that arose, or is deemed to have arisen, prior to the Petition Date, no matter how remote or contingent such right to payment or equitable remedy may be (including prepetition claims for potential unmatured injuries), **MUST FILE A PROOF OF CLAIM** on or before **5:00 p.m., prevailing Eastern Time, on April 11, 2023** (the “Hair Straightening Bar Date”) by (a) sending an original proof of claim form (by U.S. First Class Mail, overnight courier, or other hand-delivery system) that substantially conforms to the proof of claim form attached to the Hair Straightening Bar Date Order [Docket No. ____] so as to be actually received by Kroll Restructuring Administration LLC (“Kroll”), the Debtors’ claims and notice agent, by no later than 5:00 p.m., prevailing Eastern Time, on April 11, 2023, to one of the following addresses, as applicable:

If by U.S. First Class Mail:

Revlon, Inc. - Claims Processing Center
c/o Kroll Restructuring Administration LLC
Grand Central Station, PO Box 4850
New York, NY 10163-4850

-or -

If by overnight courier or other hand-delivery system:

Revlon, Inc. - Claims Processing Center
c/o Kroll Restructuring Administration LLC
850 3rd Avenue, Suite 412
Brooklyn, NY 11232

or (b) by completing the online proof of claim form available on Debtors’ restructuring website at <https://cases.ra.kroll.com/revlon/Home-Index> and clicking on the “Submit a Hair Straightening Claim” link, so that it is actually received on or before the Hair Straightening Bar Date. The online portal for submitting a proof of claim online will be made available on March 10, 2023, or as soon as reasonably practicable thereafter. If you wish to submit a proof of claim prior to the launch of the online portal, you may submit a proof of claim using the Hair Straightening Proof of Claim Form available at <https://cases.ra.kroll.com/revlon/Home-Index> by overnight mail, courier service, hand delivery, regular mail, but you will not be entitled to cast a vote on the Debtors’ proposed Plan on account of such claim. **In order to cast a vote to accept or reject the Debtors’ proposed Plan with respect to such Hair Straightening Claim, a proof of claim must be filed online for such claim in accordance with paragraph 7 of the Hair Straightening Bar Date Order on or before March 23, 2023 at 4:00 p.m., prevailing Eastern Time and you must complete your ballot and submit your vote online when you file your proof of claim.** Proofs of claim must be sent by overnight mail, courier service, hand delivery, regular mail, in person, or completed electronically through Kroll’s website. Proofs of claim sent by facsimile, telecopy, or electronic mail will **not** be accepted and will **not** be considered properly or timely filed for any purpose in these Chapter 11 Cases. If you submit a proof of claim by overnight mail, courier service, hand delivery, regular mail, or in person, or if you submit a proof of claim after March 23, 2023 at 4:00

p.m., prevailing Eastern Time, you will **not** be entitled to cast a vote on the Debtors' proposed Plan on account of such claim.

ANY PERSON OR ENTITY THAT IS REQUIRED TO FILE A PROOF OF CLAIM IN THESE CHAPTER 11 CASES WITH RESPECT TO AN ALLEGED PREPETITION CLAIM RELATING TO CHEMICAL HAIR STRAIGHTENING OR CHEMICAL HAIR RELAXING PRODUCTS AGAINST THE DEBTORS, BUT THAT FAILS TO DO SO PROPERLY BY THE APPLICABLE DATES HEREIN, SHALL BE FOREVER BARRED, ESTOPPED, AND ENJOINED FROM, AS APPLICABLE: (A) ASSERTING SUCH CLAIM AGAINST THE DEBTORS AND THEIR ESTATES (OR FILING A PROOF OF CLAIM WITH RESPECT THERETO), AND THE DEBTORS, THEIR ESTATES, AND THEIR PROPERTIES SHALL BE FOREVER DISCHARGED FROM ANY AND ALL INDEBTEDNESS OR LIABILITY WITH RESPECT TO SUCH CLAIM; AND (B) VOTING UPON, OR RECEIVING DISTRIBUTIONS UNDER, ANY CHAPTER 11 PLAN IN THESE CHAPTER 11 CASES OR OTHERWISE IN RESPECT OF OR ON ACCOUNT OF SUCH CLAIM, AND SUCH PERSON OR ENTITY SHALL NOT BE TREATED AS A CREDITOR WITH RESPECT TO SUCH CLAIM FOR ANY PURPOSE IN THESE CHAPTER 11 CASES.

A copy of the Hair Straightening Bar Date Order and the Court-approved proof of claim form may be obtained by contacting the Debtors' claims and noticing agent, in writing, at the addresses above or online at <https://cases.ra.kroll.com/Revlon>. The Hair Straightening Bar Date Order can also be viewed on the Court's website at <http://www.nysb.uscourts.gov>. If you have questions concerning the filing or processing of claims, you may contact Kroll (i) by emailing RevlonInfo@ra.kroll.com, or (ii) by phone at (855)-631-5341 within the United States or Canada or, outside of the United States or Canada, at 1-(646)-795-6968.

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
REVLON, INC., <i>et al.</i> , ¹)	
)	Case No. 22-10760 (DSJ)
Debtors.)	
)	(Jointly Administered)

ORDER DENYING THE MOTION FOR RECONSIDERATION

Upon the *Debtors' (I) Objection to Motion for Reconsideration of Hair Straightening Order and (II) Submission of a Proposed Order Denying the Motion for Reconsideration* (the "Objection")² of the above-captioned debtors and debtors in possession (collectively, the "Debtors") and the Motion; and upon the findings and rulings made on the record at a hearing before this Court on April 19, 2023 (the "Hearing"); and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012; and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having reviewed the

¹ The last four digits of Debtor Revlon, Inc.'s tax identification number are 2955. Due to the large number of Debtors in these Chapter 11 Cases, for which the Court has granted joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/Revlon>. The location of the Debtors' service address for purposes of these Chapter 11 Cases is: 55 Water St., 43rd Floor, New York, NY 10041-0004.

² Capitalized terms not otherwise herein defined shall have the meanings ascribed to such terms in the Objection.

Motion, the Objection, and the Reply³ and having heard the statements in support of the relief requested therein at the Hearing; and this Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein **for reasons stated on the record in an oral ruling that is incorporated herein**; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT: **[DSJ 4/19/2023]**

1. The Court hereby denies the relief requested in the Motion.
2. The terms and conditions of this Order are immediately effective and enforceable upon its entry.
3. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: New York, New York
April 19, 2023

s/ David S. Jones
Honorable David S. Jones
United States Bankruptcy Judge

³ *Napoli Plaintiffs' Reply on Motion for Reconsideration of Order Entered on March 7, 2023* [Docket No. 1815].